

1 K. Randolph Moore, Esq., SBN 106933  
2 Tanya E. Moore, Esq. SBN 206683  
2 MOORE LAW FIRM, P.C.  
3 332 North Second Street  
3 San Jose, California 95112  
4 Telephone (408) 271-6600  
4 Facsimile (408) 298-6046

5 | Attorneys for Plaintiff  
Ronald Moore

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

18 WHEREAS, the Court filed its Case Management Order in this matter on March 1,  
19 2011 providing that expert discovery be concluded on or before October 26, 2011 (Document  
20 19);

WHEREAS, the parties have disclosed their expert witnesses, however Kim Blackseth,  
the designated expert for Defendant Robinson Oil Corporation dba Rotten Robbie #42  
("Defendant") is not available for his deposition until November 4, 2011, a date after the  
expert discovery cut-off;

25 WHEREAS, plaintiff's designated accessibility expert Gary D. Layman is available for  
26 taking his deposition prior to the expert discovery cut-off date;

27 NOW, THEREFORE, the Parties, through their respective attorneys of record, hereby  
28 stipulate as follows:

*Moore v. Robinson Oil Corporation*  
Stipulation and [Proposed] Order Continuing Expert Discovery Cut-off Date

- 1       1. The deposition of plaintiff's accessibility expert Gary D. Layman shall take place
- 2              on November 4, 2011 at 9:30 a.m.;
- 3       2. The deposition of defendant's accessibility expert Kim Blackseth shall take place
- 4              on November 4, 2011 at 1:00 p.m.;
- 5       3. The expert discovery cut-off date is extended to November 4, 2011 for the purposes
- 6              of taking the above stated depositions only;
- 7       4. All other dates set by the Court's Case Management Order shall remain unchanged.

8       Dated: October 10, 2011

MOORE LAW FIRM, P.C.

9       \_\_\_\_\_  
/s/ Tanya E. Moore

10      Tanya E. Moore, Attorneys for Plaintiff  
Ronald Moore

11      MORGAN, FRANICH, FREDKIN & MARSH

12       \_\_\_\_\_  
/s/ Elizabeth M. Pappy

13      Elizabeth M. Pappy, Attorneys for Defendant  
Robinson Oil Corporation dba Rotten Robbie

14       **ORDER**

15      The Parties having so stipulated and good cause appearing,

16       IT IS HEREBY ORDERED that the expert discovery cut-off date be continued to  
17      November 4, 2011 exclusively for the purpose of taking the depositions of designated experts  
18      Gary D. Layman and Kim Blackseth;

19       IT IS FURTHER ORDERED that the deposition of plaintiff's expert Gary D. Layman  
20      take place on November 4, 2011 at 9:30 a.m. and the deposition of defendant's expert Kim  
21      Blackseth take place on November 4, 2011 at 1:00 p.m.

22       IT IS FURTHER ORDERED that all other dates set by the Court's Case Management  
23      Order remain unchanged.

24      Dated: \_\_\_\_\_  
25

26      \_\_\_\_\_  
United States Magistrate Judge  
Howard R. Lloyd